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June 7, 2018

VIA ECF

Hon. Lisa Margaret Smith
United States District Court
Southern District of New York
300 Quarropas Street, Courtroom 520
White Plains, New York 10601-4150

Re: Kaltner, et. al. v. Stewart, et. al.
Civil Case No.: 7:16-cv-09337

Your Honor:

The undersigned represents Mr. Stewart in the above referenced case.

At the deposition of Mr. Stewart which took place June 5, 2018, Mr. Stewart was asked to disclose the identity and address of his current employer. Counsel for Mr. Stewart objected to this disclosure. Following a phone conference with the Court, and in accordance with the Court's instructions, the undersigned hereby makes a motion for a protective order, seeking to have information regarding Mr. Stewart's current employer be stricken from the transcript and/or for that information to be designated "attorneys' eyes only."

The identity of Mr. Stewart's current employer is irrelevant to this case. Even if we accept Plaintiffs' position that Mr. Stewart's current *duties and responsibilities* are relevant, the *identity and address* of his current employer are not. Such information in the hands of Plaintiffs may lead to "annoyance, embarrassment, oppression, or undue burden or expense." *Rosas v. Alice's Tea Cup, LLC*, 127 F. Supp. 3d 4, 8, 2015 BL 216080, 3 (S.D.N.Y. 2015).

Wherefore Mr. Stewart hereby requests that the Court issue a protective order in the form attached as Exhibit A. *See Id* at 7 (S.D.N.Y. 2015) (Accordingly, the

plaintiff's application for a protective order for the identity of their current employers is granted.)

Respectfully yours,
DAI & ASSOCIATES, P.C.

/s/ Jacob Chen
By: Jacob Chen. Esq.